

## EXHIBIT K

REDACTED

## EXHIBIT L

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY;  
TATUNG COMPANY OF AMERICA, INC.;  
CHUNGHWA PICTURE TUBES, LTD.;  
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

Civil Action No. 05-292 (JJF)

**PLAINTIFF'S AMENDED INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1)**

Plaintiff LG.Philips LCD Co., Ltd. ("LPL"), by its undersigned counsel, makes the following amended initial disclosures, pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 16.2. LPL makes these disclosures based on information now reasonably available to it, and reserves the right to supplement these disclosures if necessary.

**A. PERSONS WITH KNOWLEDGE**

At this time, LPL believes the following individuals are likely to have discoverable information that LPL may use to support its claims.<sup>1</sup> The following list is limited to those persons that LPL is specifically aware of at the present time. In addition, employees and former employees of each of the Defendants, and third parties, may have knowledge supporting LPL's claims, the specific nature and identity of which is not yet known to LPL, but which may relate to at least the design, assembly, production, function, use, sale and marketing of Defendants'

<sup>1</sup> LPL recently filed its notice withdrawing without prejudice its claims related to the '121 patent, mooted all claims, counterclaims, and defenses in this case concerning the '121 patent. Accordingly, these amended disclosures relate solely to LPL's claims concerning the '002 patent. LPL reserves its rights and remedies regarding the '121 patent, and reserves the right to make any necessary amendments to these disclosures.

In addition, the following persons are likely to have discoverable information that LPL may use to support its claims:

Chunghwa Picture Tubes, Ltd. employees and representatives

Tatung Co. employees and representatives

Tatung Company of America, Inc. employees and representatives

ViewSonic Corp. employees and representatives

Defendants' affiliates, distributors, suppliers, and/or customers (including, for example, retailers that sell or have sold infringing products)

#### **B. DESCRIPTION OF DOCUMENTS**

At this time, LPL believes that the following categories of documents and things in possession of LPL or its retained counsel may be used to support LPL's claims and defenses. In making these Initial Disclosures, LPL does not waive applicable privileges or protections from disclosure, including the attorney-client privilege or work product doctrine, nor the right to designate confidential materials for appropriate protection under the protective order entered in this case. To the extent these documents are confidential, such documents are produced subject to the protective order.

- United States Patent No. 5,019,002 ("the '002 Patent"), entitled "Method of Manufacturing Flat Panel Backplanes Including Electrostatic Discharge Prevention And Displays Made Thereby," issued on May 28, 1991;
- The prosecution history files of the United States Patent and Trademark Office for the '002 Patent;
- The references cited in the prosecution history files of the United States Patent and Trademark Office for the '002 Patent;
- Technical documents and specifications published by Defendants;
- Documents and information regarding identification and/or manufacturing of infringing products made, imported, sold, and/or offered for sale by Defendants, directly or indirectly;

- Documents related to the marketing, offering for sale, and selling of infringing products, directly or indirectly;
- Correspondence between LPL and Defendants regarding the '002 Patent.
- Documents exchanged and obtained in discovery in this case or other cases for which the parties have stipulated that discovery in those cases may be used in this case (for example, the consolidated cases LG.Philips LCD Co., Ltd. v. Tatung Co. of America, et al., Case Nos. CV 02-6775 CBM (JTLx), CV 03-2866 CBM (JTLx), CV 03-2884 CBM (JTLx), CV 03-2885 CBM (JTLx), CV 03-2886 CBM (JTLx) (C.D. Cal.).)
- Mask work files and Motherglass samples

### **C. COMPUTATION OF DAMAGES**

LPL has experienced, and continues to suffer, economic and irreparable harm as a result of Defendants' individual and collective infringement of the '002 Patent.

Pursuant to 35 U.S.C. § 284, LPL is seeking damages for Defendants' infringement of the '002 Patent, in the amount equal to, at a minimum, a reasonable royalty, together with pre- and post-judgment interest and costs as fixed by the Court. *See also*, LPL's Supplemental Answers to Defendants' Interrogatories dated February 28, 2006. LPL will also seek increased damages and attorneys' fees, as appropriate, because by continuing to use, make, offer for sale, and sell infringing devices, Defendants are engaged in willful and deliberate infringement which justifies increased damages and which may qualify this as an exceptional case supporting recovery of attorney's fees pursuant to 35 U.S.C. § 285.

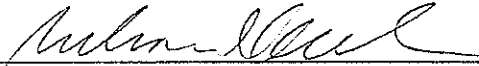
Any computation of damages, including a reasonable royalty, is dependent in part on discovery and disclosures to be received from Defendants. LPL cannot provide a complete calculation of damages at this time. LPL reserves the right to modify its damages theories and calculations or to seek damages under different theories as appropriate in view of information to be discovered in this case and in view of anticipated expert opinions on the subject of damages.

**D. INSURANCE AGREEMENTS**

LPL is aware of no insurance agreements pertinent to this litigation.

LPL expressly reserves the right to supplement these initial disclosures.

THE BAYARD FIRM



Richard D. Kirk (#922)  
222 Delaware Avenue, Suite 900  
P.O. Box 25130  
Wilmington, DE 19899-5130  
(302) 429-4208

*Counsel for Plaintiff*  
*LG.PHILIPS LCD CO., LTD.*

OF COUNSEL:

Gaspare J. Bono  
Cass W. Christenson  
McKenna Long & Aldridge LLP  
1900 K Street, NW  
Washington, DC 20006  
(202) 496-7500

Dated: May 9, 2006

DC:50408418.1

**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that, on May 9, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Robert W. Whetzel, Esq.  
Matthew W. King, Esq.  
Richards, Layton & Finger  
One Rodney Square  
P.O. Box 551  
Wilmington, DE 19899

The undersigned counsel further certifies that copies of the foregoing document were sent on May 9, 2006 by email and by hand to the above counsel and by email and first class mail to the following non-registered participants:

Christine A. Dudzik, Esq.  
Thomas W. Jenkins, Esq.  
Howrey LLP  
321 North Clark Street  
Suite 3400  
Chicago, IL 60610

Teresa M. Corbin, Esq.  
Glenn W. Rhodes, Esq.  
Julie Gabler, Esq.  
Howrey LLP  
525 Market Street  
Suite 3600  
San Francisco, CA 94105

/s/ Richard D. Kirk (rk0922)  
Richard D. Kirk



## EXHIBIT M

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IN THE UNITED STATES DISTRICT COURT  
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Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY;  
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<sup>1</sup> On May 1, 2006, LPL withdrew without prejudice its claims related to the '121 patent, mooted all claims, counterclaims, and defenses in this case concerning the '121 patent. (D.I. Nos. 179, 180.) Accordingly, these amended disclosures relate solely to LPL's claims concerning the '002 patent. LPL reserves its rights and remedies regarding the '121 patent, and reserves the right to make any necessary amendments to these disclosures.

Knowledgeable regarding subjects including the '002 patent, infringement, and validity.

Arthur Cobb (Expert Witness)

4010 IDS Center

Minneapolis, MN 55402

Knowledgeable regarding subjects including damages and reasonable royalties for infringement.

In addition, the following persons are likely to have discoverable information that LPL may use to support its claims:

Chunghwa Picture Tubes, Ltd. employees and representatives

Tatung Co. employees and representatives

Tatung Company of America, Inc. employees and representatives

ViewSonic Corp. employees and representatives

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- United States Patent No. 5,019,002 ("the '002 Patent"), entitled "Method of Manufacturing Flat Panel Backplanes Including Electrostatic Discharge Prevention And Displays Made Thereby," issued on May 28, 1991;
- The prosecution history files of the United States Patent and Trademark Office for the '002 Patent;

- The references cited in the prosecution history files of the United States Patent and Trademark Office for the '002 Patent;
- Technical documents and specifications published by Defendants;
- Documents and information regarding identification and/or manufacturing of infringing products made, imported, sold, and/or offered for sale by Defendants, directly or indirectly;
- Documents related to the marketing, offering for sale, and selling of infringing products, directly or indirectly;
- Correspondence between LPL and Defendants regarding the '002 Patent.
- Documents exchanged and obtained in discovery in this case or other cases for which the parties have stipulated that discovery in those cases may be used in this case (for example, the consolidated cases LG.Philips LCD Co., Ltd. v. Tatung Co. of America, et al., Case Nos. CV 02-6775 CBM (JTLx), CV 03-2866 CBM (JTLx), CV 03-2884 CBM (JTLx), CV 03-2885 CBM (JTLx), CV 03-2886 CBM (JTLx) (C.D. Cal.).)
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Any computation of damages, including a reasonable royalty, is dependent in part on discovery and disclosures to be received from Defendants. LPL cannot provide a complete calculation of damages at this time. LPL reserves the right to modify its damages theories and calculations or to seek damages under different theories as appropriate in view of information to be discovered in this case and in view of anticipated expert opinions on the subject of damages. LPL's damages analysis is further addressed in the expert report of Arthur Cobb, dated June 2, 2006, which LPL incorporates herein by reference.

**D. INSURANCE AGREEMENTS**

LPL is aware of no insurance agreements pertinent to this litigation.

LPL expressly reserves the right to supplement these initial disclosures.

June 5, 2006

THE BAYARD FIRM

/s/ Richard D. Kirk (rk0922)

Richard D. Kirk (#0922)  
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*Counsel for Plaintiff*  
*LG.PHILIPS LCD CO., LTD.*

OF COUNSEL:  
Gaspere J. Bono  
Cass W. Christenson  
McKenna Long & Aldridge LLP  
1900 K Street, NW  
Washington, DC 20006  
(202) 496-7500

IN THE UNITED STATES DISTRICT COURT  
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Plaintiff/Counterclaim Defendant,

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Civil Action No. 05-292 (JJF)

TATUNG COMPANY,  
TATUNG COMPANY OF AMERICA, INC.;  
CHUNGHWA PICTURE TUBES, LTD.;  
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

**NOTICE OF SERVICE**

PLEASE TAKE NOTICE that, on June 5, 2006, copies of PLAINTIFF'S AMENDED INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1) and this NOTICE OF SERVICE were served as shown:

**BY EMAIL AND BY HAND**

Robert W. Whetzel, Esq.  
Matthew W. King, Esq.  
Richards, Layton & Finger  
One Rodney Square  
P.O. Box 551  
Wilmington, DE 19899

**BY EMAIL AND BY U.S. MAIL**

Christine A. Dudzik, Esq.  
Thomas W. Jenkins, Esq.  
Howrey LLP  
321 North Clark Street  
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Teresa M. Corbin, Esq.  
Glenn W. Rhodes, Esq.  
Julie Gabler, Esq.  
Howrey LLP  
525 Market Street  
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San Francisco, CA 94105

June 5, 2006

THE BAYARD FIRM

/s/ Richard D. Kirk (rk0922)

Richard D. Kirk (#0922)

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Wilmington, DE 19899-5130

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Counsel for Plaintiff

LG.PHILIPS LCD CO., LTD.

OF COUNSEL:

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Matthew T. Bailey

Andrew J. Park

McKenna Long & Aldridge LLP

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Washington, D.C. 20006

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## EXHIBIT N

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REDACTED

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## EXHIBIT O

REDACTED

## EXHIBIT P

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# HOWREY<sup>LLP</sup>

550 South Hope Street  
Suite 1100  
Los Angeles, CA 90071-2627  
T 213.892.1800  
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June 9, 2006

DIRECT DIAL 213.892.2502

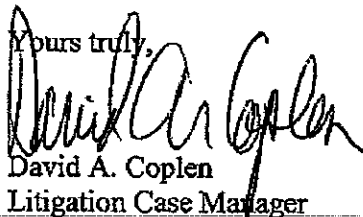
**VIA FEDERAL EXPRESS**

Anthony C. Roth, Esq.  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, N.W.  
Washington, DC 20004

Re: *LG. Philips LCD Co., Ltd. v. Tatung Co. of America, et al.*  
Case No. CV-02-6775 CBM (JTLx)

Dear Mr. Roth:

Enclosed are additional documents which have been bates labeled CPT 288287 to CPT 288353. These documents are produced in accordance with the agreement of the parties to supplement their prior discovery responses. Please note that all of these documents are labeled "Confidential Attorneys Only."

Yours truly,  
  
David A. Coplen  
Litigation Case Manager

DAC:cs  
Enclosures

cc: M. Krietzman (w/encls.)

From: Origin ID: (213)892-2502  
 David Copen  
 Howrey Simon Arnold White  
 550 S. Hope St. - #1100

Los Angeles, CA 90071



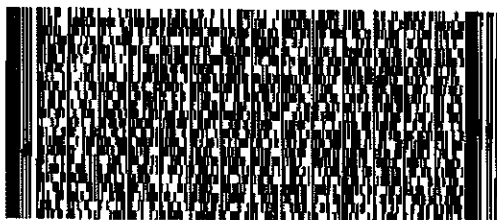
CLSR22364/16/20

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BILL SENDER

**Anthony Roth**  
**Morgan Lewis & Bockius, LLP**  
 1111 Pennsylvania Avenue, N.W.

**Washington, D.C., DC 20004**



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## EXHIBIT Q

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June 22, 2006

Direct Dial 312.595.1239

File 01450.0012.000000

VIA MESSENGER

Cass W. Christenson, Esq.  
McKenna Long & Aldridge LLP  
1900 K Street, N.W.  
Washington, D.C. 20006

Re: *LG. Philips LCD Co., Ltd. v. Tatung Company et al.*  
Civil Action No. 05-292 (JJF)

Dear Cass:

Enclosed are documents numbered WAG 00001-003077.

Sincerely,



Elsa Doi  
Paralegal

Encl.